

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

BING GUAN, GO NAKAMURA, MARK
ABRAMSON, KITRA CAHANA, and ARIANA
DREHSLER,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of the U.S.
Department of Homeland Security, in his official
capacity; CHRIS MAGNUS, Commissioner of U.S.
Customs and Border Protection, in his official
capacity; TAE JOHNSON, Acting Director of U.S.
Immigration and Customs Enforcement, in his official
capacity,

Defendants.

No. 1:19-CV-6570 (PKC/MMH)

NOTICE OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD

TO: THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 1.4, Mitra Ebadolahi of American Civil Liberties Union Foundation of San Diego & Imperial Counties hereby moves to withdraw as counsel for Plaintiffs Bing Guan, Go Nakamura, Mark Abramson, Kitra Cahana and Ariana Drehsler in the above captioned matter. Plaintiffs remain represented by their other attorneys of record and no substitution of counsel will therefore be necessary. Please remove Mitra Ebadolahi from the docket as counsel of record.

Dated: April 21, 2022
San Diego, California

Respectfully submitted,
By: s/ Mitra Ebadolahi
Mitra Ebadolahi
ACLUF San Diego & Imperial Counties
P.O. Box 87131, San Diego CA 92138-7131
Telephone: 619.398.4187
mebadolahi@aclusandiego.org
Attorney for Plaintiffs

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DECLARATION OF MITRA EBADOLAHİ PURSUANT TO LOCAL CIVIL RULE 1.4

I, Mitra Ebadolahi, respectfully declare under penalty of perjury pursuant to 28 U.S.C.
§ 1746 that the following is true and correct:

1. I am a Senior Staff Attorney employed by the ACLU Foundation of San Diego & Imperial Counties. I have served in this capacity since May 2013. I am licensed to practice law by the State of California and the State of New York.
2. I have been attorney-of-record in this case since this Court granted my pro hac vice application on January 27, 2020.
3. The procedural posture of the case is as follows: the parties are in the midst of discovery, which is governed by the Court's Scheduling Order of December 17, 2021 (Dkt. #70).
4. I am moving to withdraw as counsel for the plaintiffs in this case because I am ending

my employment at the ACLU Foundation of San Diego & Imperial Counties,
effective April 28, 2022.

5. My departure from the ACLU Foundation of San Diego & Imperial Counties provides a satisfactory reason for, and requires, my withdrawal as an attorney in this case. My colleague Esha Bhandari has served as co-counsel in this case from the beginning and will continue as counsel for Plaintiffs in this action. Ms. Bhandari will capably represent Plaintiffs' interests in the future.
6. Since this is a government case, there is no retaining or charging lien involved.

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that true and correct copies of the foregoing **Notice of Motion to Withdraw as Attorney of Record by Mitra Ebadolahi** were filed electronically on April 21, 2022, with the United States District Court for the Eastern District of New York.

Notice of this filing will be sent via electronic mail to all parties who have entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

Dated: April 21, 2022
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